

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MICHAEL WELCH,

Plaintiff,

vs.

Case No: 18-cv-11450
Hon. Laurie J. Michelson
Mag. Mona K. Majzoub

CITY OF MELVINDALE, *a political
Subdivision of the State*; **MELVINDALE
PUBLIC SAFETY COMMISSION**, *a political
advisory body of the City of Melvindale*;
**JEFFERY BOLTON, KEVIN MCISAAC,
MARTHA MCDANIEL, PATRICIA HALL,
JOSEPH ALVARADO, and LAWRENCE
COOGAN**, *individuals, sued in their official and
personal capacities,*

Defendants.

DEBORAH GORDON LAW

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PLAINTIFF'S PRELIMINARY LAY AND EXPERT WITNESS LIST

NOW COMES Plaintiff Michael Welch, by and through his attorneys,
Deborah Gordon Law, and submits the following list of witnesses that he may call
at trial in this matter:

1. Plaintiff Michael Welch
2. Melissa Welch
3. Jeffrey Bolton
4. Kevin McIsaac
5. Martha McDaniel
6. Patricia Hall
7. Jason Ortiz
8. Joseph Alverado
9. Lawrence Coogan
10. Roger Kaley
11. John Allen
12. Stacy Bazman / Striz
13. Richard Ortiz
14. Matthew Furman

15. Brandon Nolin
16. Robert Kennaley
17. Donald Meador
18. Gary Bowerman
19. Chad Hayse
20. Chester Kulesza
21. Brandon Canfield
22. Chad Detrich
23. Sara Lane
24. John Ginther
25. Michael Thomson, Ph.D., Thomson Econometrics & Employment
Research
26. All treating and/or examining physicians, psychiatrists, psychologists,
and health care professionals for Plaintiff, including but not limited to:
 - a. Dr. Joseph Zambo; and
 - b. Dr. Steven Crossley
27. Keepers of the records for all treating and/or examining physicians,
psychiatrists, psychologists, and health care professionals for Plaintiff

28. Any current or former employees, representatives, agents, record keepers, or contractors of Defendants who may have information pertaining to Plaintiff's claims or Defendants' defenses
29. Any current or former employees, representatives, agents, record keepers, or contractors of the Melvindale Police Department who may have information pertaining to Plaintiff's claims or Defendants' defenses
30. Any current or former employees, representatives, agents, record keepers, or contractors of the Police Officers' Labor Council who may have information pertaining to Plaintiff's claims or Defendants' defenses
31. Any current or former employees, representatives, agents, record keepers, or contractors of Coogan Law or any other related entities who may have information pertaining to Plaintiff's claims or Defendants' defenses
32. All individuals identified in answers to interrogatories, requests for production of documents, depositions, duces tecum notices, initial disclosures, and all other discovery produced by any party
33. All witnesses on Defendants' witness lists
34. Any and all necessary rebuttal lay and expert witnesses
35. Any and all witnesses necessary to lay the foundation for the admission of evidence
36. Any and all witnesses necessary to authenticate

37. Any and all records keepers
38. Plaintiff reserves the right to supplement and/or amend this witness list if additional discovery is produced.

Dated: September 28, 2018

DEBORAH GORDON LAW

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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2018 I electronically filed with the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

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